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70-340

Spencer Chemical Company  
Dwight Building  
Kansas City, Missouri

Attention: Mr. Norman Greenlee

Gentlemen:

This refers to the inspection conducted on May 2 - 5, 1961, of activities at your Jayhawk Works, Pittsburg, Kansas, licensed under Source Material License No. C-4352 and Special Nuclear Material License Nos. SNM-154 and SNM-329.

It appears that certain of your activities were not conducted in full compliance with a condition of a license and the requirements of the AEC's "Standards for Protection Against Radiation," Part 20, Title 10, Code of Federal Regulations, in that:

1. Surveys conducted pursuant to Section 20.201(b), "Surveys," were insufficient as follows:

a. Time occupancy studies and time weighted exposure evaluations had not been made to determine compliance with Section 20.103(a), "Exposure of individuals to concentrations of radioactive material in restricted areas."

b. Environmental air surveys had not been conducted to determine compliance with Section 20.106(b), "Concentrations in effluents to unrestricted areas," with respect to airborne radioactivity.

2. Facilities and activities did not conform with statements in license applications, in violation of License Condition No. 8, "Authorized use," as follows:

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2. continued

- a. The position of furnaces with respect to the location of hoods in "T" Room, Building No. 702, did not conform with Item 1, Page 3 of the license application dated January 4, 1960.
- b. The furnace box was not loaded in the manner described in Item 5, Page 3 of the license application dated January 4, 1960.
- c. Exhaust air from the hood in Room 16 of Building 702 was not filtered as described in Item 4, Paragraph A (Equipment) of the license application dated December 28, 1959.
- d. Fused  $UO_2$  is not stored in an inert atmosphere as described in paragraph 2(b) of the license application dated February 2, 1960.

Pursuant to the provisions of Section 2.201, "Notice of violation," of the AEC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, you are required to notify this office in writing within thirty days of your receipt of this notice, admitting or denying the alleged violations, the reasons for the violations if admitted, the corrective steps taken or to be instituted in achieving correction and preventing further violations, and the date when full compliance has been or will be achieved.

With respect to Item 1(a) above, you are requested to include in your reply the following information:

- a. A detailed description of the air survey program you will follow in determining compliance with Section 20.103(a), and the date that such program was or will be put into effect.
- b. A detailed description of the methods you will follow in determining average weekly airborne radioactivity exposures to those individuals who frequently or occasionally occupy areas with concentrations in excess of Appendix B, Table I, Column 1.

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With respect to Item 1(b) we are enclosing a copy of our air survey guide entitled, "A Basis for Surveying to Determine Concentrations of Radioactive Material Discharged as Air Effluents from Uranium Mills," which may be useful to you in instituting an environmental air survey program to determine compliance with Section 20.106(b).

We note that concentrations of airborne radioactivity in some plant work areas are sufficiently high that it is possible that individuals have been exposed in excess of the limits specified in Section 20.103(a), "Exposure of individuals to concentrations of radioactive material in restricted areas." Therefore, you are requested to submit with your reply to this letter, the results of a weakly weighted exposure evaluation for each employee who is exposed to concentrations of airborne radioactivity in excess of the limits specified in Appendix B, Table I, Column 1.

Very truly yours,

Eber R. Price  
 Assistant Director  
 Division of Licensing  
 and Regulation

Enclosures:

1. 10 CFR 20
2. 10 CFR 2
3. Air Survey Guide

bcc: Compliance Division, HQ  
 Compliance Division, III  
 Public Document Room - to B. Jones for w/holding

SIGNED CONCURRENCE COPY IN DOCKET 70-146

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